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9 **Attorneys for Plaintiff**
10 **Innovative Sports Management, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 **Innovative Sports Management, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Renzo Macchiavello, et al.,**

17 **Defendants.**

18 **CASE NO. 8:12-cv-01748-TJH-PLA**

19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT AGAINST**
21 **DEFENDANTS RENZO MACCHIAVELLO,**
22 **individually and d/b/a RENZO'S TASTE OF**
23 **PERU; AND MICCHIAVELLO, LLC, an**
24 **unknown business entity d/b/a RENZO'S**
25 **TASTE OF PERU**

26 **IT IS HEREBY STIPULATED** by and between Plaintiff INNOVATIVE SPORTS
27 MANAGEMENT, INC. and Defendants RENZO MACCHIAVELLO, individually and d/b/a
28 RENZO'S TASTE OF PERU; AND MICCHIAVELLO, LLC, an unknown business entity d/b/a
29 RENZO'S TASTE OF PERU, that the above-entitled action is hereby dismissed **without prejudice**
30 against RENZO MACCHIAVELLO, individually and d/b/a RENZO'S TASTE OF PERU; AND
31 MICCHIAVELLO, LLC, an unknown business entity d/b/a RENZO'S TASTE OF PERU and
32 subject to the Court's jurisdiction to enforce the settlement agreement reached between the Parties.

33 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
34 motion to reopen this action by April 30, 2014, the dismissal shall be deemed to be **with prejudice**.

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1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party
2 referenced-above shall bear its own attorneys' fees and costs.
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6 Dated: March 20, 2014

s/Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

7 By: Thomas P. Riley

8 Attorneys for Plaintiff

9 INNOVATIVE SPORTS MANAGEMENT, INC.

10
11 Dated: March 20, 2014

s/Matthew A. Pare

LAW OFFICES OF MATTHEW A. PARE, APC

12 By: Matthew A. Pare

13 Attorneys for Defendants

14 RENZO MACCHIAVELLO, individually and d/b/a

15 RENZO'S TASTE OF PERU; AND MICCHIAVELLO, LLC,
16 an unknown business entity d/b/a RENZO'S TASTE OF
17 PERU

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2 **PROOF OF SERVICE (SERVICE BY MAIL)**
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4
5 I declare that:
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7 I am employed in the County of Los Angeles, California. I am over the age of eighteen
8 years and not a party to the within cause; my business address is First Library Square, 1114 Fremont
9 Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for
10 collection and processing of correspondence/documents for mail in the ordinary course of business.
11

12 On March 20, 2014, I caused to serve the following documents entitled:
13

14 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST
15 DEFENDANTS RENZO MACCHIAVELLO, individually and d/b/a RENZO'S
16 TASTE OF PERU; AND MICCHIAVELLO, LLC, an unknown business entity d/b/a
17 RENZO'S TASTE OF PERU**

18 On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage
19 prepaid and following ordinary business practices, said envelope was addressed to:
20

21 Mr. Matthew A. Pare, Esquire
22 **LAW OFFICES OF MATTHEW A., A.P.C.**
23 823 Anchorage Place, Suite 114
24 Chula Vista, CA 91914

25 (Attorneys for Defendants Renzo
26 Macchiavello and Macchiavello, LLC)

27 The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's
28 outbound mail receptacle in order that this particular piece of mail could be taken to the United States
Post Office in South Pasadena, California later this day by myself (or by another administrative
assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the
foregoing is true and correct and that this declaration was executed on March 20, 2014, at South
Pasadena, California.

Dated: March 19, 2014

s/Vanessa Ventura

VANESSA VENTURA